

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

ePLUS INC.,)	
)	
Plaintiff,)	Civil Action No. 3:09-CV-620 (REP)
)	
v.)	
)	
LAWSON SOFTWARE, INC.,)	
)	
)	
)	
Defendant.)	

PLAINTIFF ePLUS INC.'S NOTICE OF FILING
REPLY NIEMEYER EXPERT REPORT

Plaintiff ePlus, Inc., by counsel, in accordance with the Amended Protective Order entered in this case on November 16, 2009, hereby gives notice that today it has filed **UNDER SEAL** with the Clerk of Court the Reply Expert Report of Patrick Niemeyer Concerning Defendant's Contempt of the Court's Permanent Injunction and Exhibit A thereto.

A copy of the report and exhibit was served on counsel for Defendant Lawson Software, Inc. on January 27, 2012.

January 30, 2012

Respectfully submitted,

ePLUS, INC.

By Counsel

/s/

Craig T. Merritt (VSB #20281)
Paul W. Jacobs II (VSB # 16815)
Henry I. Willett, III (VSB #44655)
CHRISTIAN & BARTON, LLP
909 East Main Street, Suite 1200
Richmond, Virginia 23219-3095
Telephone: (804) 697-4100
Facsimile: (804) 697-4112
cmerritt@cblaw.com
pjacobs@cblaw.com
hwillett@cbblaw.com

Scott L. Robertson (*admitted pro hac vice*)
Jennifer A. Albert (*admitted pro hac vice*)
David M. Young (VSB #35997)
GOODWIN PROCTER LLP
901 New York Avenue, N.W.
Washington, DC 20001
Telephone: (202) 346-4000
Facsimile: (202) 346-4444
srobertson@goodwinprocter.com
jalbert@goodwinprocter.com
dyoung@goodwinprocter.com

Michael G. Strapp (*admitted pro hac vice*)
GOODWIN PROCTER LLP
Exchange Place
53 State Street
Boston, MA 02109-2881
Telephone: (617) 570-1000
Facsimile: (617) 523-1231
mstrapp@goodwinprocter.com

Counsel for Plaintiff, ePlus, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of January, 2012, I will electronically file the foregoing

**PLAINTIFF *e*PLUS INC.'S NOTICE OF FILING
REPLY NIEMEYER EXPERT REPORT**

with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) via email to counsel of record.

<p>Daniel J. Thomasch, <i>pro hac vice</i> GIBSON, DUNN & CRUTCHER LLP 200 Park Avenue New York, NY 10166-0193 (212) 351-3800</p> <p>Jason C. Lo, <i>pro hac vice</i> GIBSON, DUNN & CRUTCHER LLP 333 South Grand Avenue Los Angeles, CA 90071-3197 (213) 229-7153 VAED-620ExternalServiceList@gibsondunn.com</p>	<p>Daniel McDonald, <i>pro hac vice</i> Kirsten Stoll-DeBell, <i>pro hac vice</i> William D. Schultz, <i>pro hac vice</i> Rachel C. Hughey, <i>pro hac vice</i> Andrew Lagatta, <i>pro hac vice</i> MERCHANT & GOULD 3200 IDS Center 80 South Eighth Street Minneapolis, MN 55402 Telephone: (612) 332-5300 Facsimile: 612) 332-9081 lawsonservice@merchantgould.com</p>
<p>Donald R. Dunner, <i>pro hac vice</i> Erika H. Arner, <i>pro hac vice</i> FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, LLP 901 New York Avenue, NW Washington, DC 20001 (202) 408-4000 (202) 408-4400 EXT-Lawson-FinneganCorrespondence@finnegan.com</p>	<p>Robert A. Angle, VSB#37691 Dabney J. Carr, IV, VSB #28679 TROUTMAN SANDERS LLP P.O. Box 1122 Richmond, Virginia 23218-1122 (804) 697-1238 (804) 698-5119 (Fax) robert.angle@troutmansanders.com dabney.carr@troutmansanders.com</p>
<p><i>Counsel for Defendant Lawson Software, Inc.</i></p>	

/s/

Craig T. Merritt (VSB #20281)
Counsel for Plaintiff *e*Plus, Inc.
CHRISTIAN & BARTON, LLP
909 East Main Street, Suite 1200
Richmond, Virginia 23219-3095
Telephone: (804) 697-4100
Facsimile: (804) 697-4112
cmerritt@cblaw.com